

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

UNITED STATES OF AMERICA)	
)	
Plaintiff,)	
)	No. 18 CR 789
v.)	
)	Hon. Gary Feinerman
DENY MITROVICH,)	
)	
Defendants.)	

EMERGENCY MOTION TO MODIFY CONDITIONS OF RELEASE

Now comes the defendant, Deny Mitrovich, by and through his undersigned attorney, and respectfully asks this Honorable Court to enter an order modifying the conditions of his release to allow him to attend the wake, funeral, and other family services for his recently deceased father. In support, the following is offered:

1. Mr. Mitrovich's currently released on a \$50,000 secured bond. As part of the conditions of release, Mr. Mitrovich was placed on home detention with electronic monitoring. His movement is limited to work, medical appointments, and attorney meetings.

2. Early this week, Mr. Mitrovich's father passed away. They were extremely close. Today, various services and memorials were scheduled for Monday, March 8, 2021 and Tuesday, March 9, 2021.

3. Mr. Mitrovich is respectfully asking this Honorable Court to modify the conditions of his release to allow him movement on Monday, March 8, 2021 from 8:00am until 8:00pm and on Tuesday, March 9, 2021 from 8:00am until 8:00pm. One these two day, Mr. Mitrovich will only go to two locations: his mother's house and the

funderal home and cemetery. His mother's house is located at 1900 W. Irving Park Road, Chicago, Illinois 60613. The funeral home and cemetery is located at 5255 N. Pulaski Road, Chicago, Illinois. These are the only two places Mr. Mitrovich is asking for permission to be during the two days of movement he is request.

4. Mr. Mitrovich has no previous violations or alleged violations of his conditions of release.

5. Due to the fact that the undersigned just learned of the location and schedule of Mr. Mitrovich's father, and due to that fact that it is late in the afternoon of a Friday prior to the requested movement, the undersigned has not had the opportunity to discuss with either the Assistant U.S. Attorney Andrew Erskine or Mr. Mitrovich's Pretrial Services Office regarding their position as to this requestion.

Wherefore, for the reasons stated above, defendant Deny Mitrovich respectfully asks this Honorable Court to enter an order allowing him movement on Monday, March 8, 2021 from 8:00am until 8:00pm and on Tuesday, March 9, 2021 from 8:00am until 8:00pm for the purposes of attention funeral related services for his recently deceased father at the two locations noted above.

Respectfully submitted,

/s Vadim A. Glozman
Attorney For Deny Mitrovich

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CERTIFICATE OF SERVICE

I, Vadim A. Glozman, an attorney for Defendant Deny Mitrovich, hereby certify that on this, the 5th day of March, 2021, I filed the above-described document on the CM-ECF system of the United States District Court for the Northern District of Illinois, which constitutes service of the same.

Respectfully submitted,

/s/ Vadim A. Glozman

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